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June 21, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Alaska Communications, Notice of *Ex Parte* Communication,
GN Docket No. 18-122, RM-11791, RM-11778

Dear Ms. Dortch:

On Tuesday, June 18, 2019, Anand Vadapalli, Bill Bishop, and Leonard Steinberg of Alaska Communications, together with Karen Brinkmann of Karen Brinkmann PLLC, and I met with Chairman Pai and Preston Wise regarding the above-referenced proceedings.

On Wednesday, June 19, 2019, Bill Bishop, Leonard Steinberg, Karen Brinkmann, and I also met with Tom Sullivan, Jim Schlichting, Jennifer Gilsenan, Jose Albuquerque, and Paul Blais of the International Bureau, and Becky Schwartz, Tom Derenge, Paul Powell, and Lauren Earley of the Wireless Telecommunications Bureau, regarding the above-referenced proceedings.

In the meeting, we explained that the record in these proceedings strongly supports preservation of the entire 3.7-4.2 GHz band for satellite downlink communications in Alaska. Satellite services are the most reliable and cost-effective way (and often the only feasible way) to communicate with native Alaskan villages and other remote Bush communities. Given the state's extreme northerly latitudes and harsh weather conditions, the C-band offers better performance, availability, and coverage than other satellite spectrum bands, making it far superior to other spectrum for serving customers in Alaska. Over much of the year, travel difficulties make it difficult at best for Alaska Communications network technicians to reach remote customer sites, making it vital that the service be as reliable as possible in all conditions.

Alaska Communications uses C-band satellite earth stations to provide services supported by the Commission's schools and libraries universal service support mechanism ("E-rate"), including to the Kuspuk School District along the Kuskokwim River in southwest Alaska, as well to serve rural health care providers, the Federal Aviation Administration, other federal and state government entities, public safety first responders, native-owned economic development enterprises, seafood processing facilities, and others. Our customers routinely insist on receiving C-band services specifically because they know that they consistently perform more reliably than Ku- or Ka-band alternatives. In fact, when its previous contract expired, the Kuspuk School District chose Alaska Communications' service over that of its former service provider, in part because Alaska Communications offered a C-band solution instead of Ku-band.

We explained that, in contrast to the importance of the 3.7-4.2 GHz spectrum for satellite communications, existing spectrum allocations provide sufficient capacity to support deployment of terrestrial mobile 5G services, such that no new allocation is needed. In large cities in the lower 48 states, population density may range into the tens of thousands of people per square mile. New York City, for example, has over 27,000 people per square mile, and over 69,000 people per square mile in Manhattan. Alaska's small population and low population density stand in sharp contrast, with Anchorage, the most densely populated city in Alaska, having 171 people per square mile.

For these reasons, the record in these proceedings strongly supports retaining the 3.7-4.2 GHz band for satellite communications in Alaska, and the proposal offered by the C-Band Alliance would exempt Alaska from any reallocation of this spectrum to terrestrial mobile use. That position is echoed by numerous other parties that recognize the uniquely important role of this spectrum in supporting satellite telecommunications connectivity in the state, including, the Satellite Industry Association, GCI Communications Corp., AT&T, Speedcast Communications, QVC/HSN, and National Public Radio, and others. We therefore continue to request that the Commission incorporate such an exemption into the rules it adopts in this proceeding.

Please direct any questions regarding this matter to me.

Very truly yours,

Richard R. Cameron
Counsel to Alaska Communications

cc: Meeting Attendees